

1 THE HONORABLE JAMES L. ROBART
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RENEE BERGESON,

Plaintiff,

v.

THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA; and
MICROSOFT CORPORATION WELFARE
PLAN,

Defendants.

Case No. 2:17-cv-00769-JLR

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO
COMPLAINT**

NOTE ON MOTION CALENDAR:
July 6, 2017

Defendant Microsoft Corporation Welfare Plan (the "Plan"), by and through its attorneys, moves this Court for an order extending the time for the Plan to answer or otherwise respond to the complaint. The Plan's response or answer is currently due July 10, 2017. Plaintiff Renee Bergeson ("Plaintiff") does not oppose this motion. The Plan respectfully requests an extension of time to answer or otherwise respond until July 18, 2017. In support of its unopposed motion, the Plan states as follows:

1. On May 18, 2017, Plaintiff filed this action in the U.S.D.C. for the Western District of Washington.

2. Defendant The Prudential Insurance Company of America ("Prudential") was served through the Washington Insurance Commissioner, and its response is currently due July 18, 2017.

UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO COMPLAINT
(No. 2:17-cv-00769-JLR) - 1

119219.0022/7010345.1

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1 3. The Plan was served on June 20, 2017, and its response is currently due on July
2 10, 2017.

3 4. The Plan began promptly collecting and reviewing the relevant file documents in
4 order to prepare a response to Plaintiff's complaint, but requests an additional time of 8 days to
5 complete its investigation and prepare its response.

6 5. Further, Prudential and the Plan are represented by the same counsel, and this
7 extension would allow Defendants' counsel to better coordinate Defendants' response to the
8 complaint.

9 6. On July 5, 2017, counsel for Defendants conferred with counsel for Plaintiff
10 regarding the request for an extension until July 18, 2017 to answer or otherwise respond to
11 Plaintiff's complaint. Plaintiff's counsel indicated that Plaintiff does not oppose this request.

12 7. This motion is filed before the response to the complaint is due and is filed in
13 good faith and not for the purpose of unwarranted delay.

WHEREFORE, the Plan respectfully requests that the Court issue an order granting the
Plan until July 18, 2017, to answer or otherwise respond to Plaintiff's complaint.

16 DATED: July 6, 2017

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Attorneys for Defendants The Prudential Insurance Company of America and Microsoft Corporation Welfare Plan

UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO COMPLAINT
(No. 2:17-cv-00769-JLR) - 2

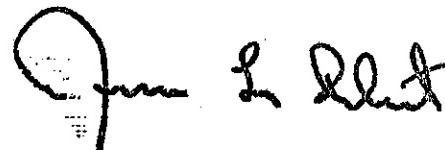
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1 **ORDER**

2 Having reviewed the unopposed motion for extension of time to answer or otherwise
3 respond to the complaint, the Court hereby GRANTS the motion and ORDERS that Microsoft
4 Corporation Welfare Plan's deadline to answer or otherwise respond to the complaint is extended
5 until July 18, 2017.

6 IT IS SO ORDERED.

7 DATED this 7th day of July, 2017.



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9
10 Honorable James L. Robart
11 United States District Court Judge

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UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR
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(No. 2:17-cv-00769-JLR) - 3
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1 CERTIFICATE OF SERVICE

2 Pursuant to RCW 9A.72.085, the undersigned certifies under penalty of perjury under the
3 laws of the State of Washington that, on the date listed below, the document attached hereto was
4 presented to the Clerk of the Court for filing and uploading to the CM/ECF system. In accordance
5 with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-
6 mail notification of such filing to the following persons:

7 Steven P. Krafchick
8 Krafchick Law Firm
9 300 South Tower
10 100 W Harrison
11 Seattle, WA 98119-4192
12 klf@krafchick.com

13 Executed on the 6th day of July, 2017, at Seattle, Washington.

14 _____
15 *s/ Lou Rosenkranz*
16 Lou Rosenkranz, Legal Assistant

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UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR
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